



Campaign for a Commercial-Free Childhood

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Federal Trade Commission
Office of the Secretary
Room 159-H (Annex H)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Food Marketing to Kids Workshop—Comment, Project No. P034519

Dear Mr. Clark:

The Campaign for a Commercial-Free Childhood, herein referred to as “The Campaign”, respectfully submits this letter in response to the Federal Trade Commission’s (“FTC” or “Commission”) request for comments for its upcoming workshop on Marketing, Self-Regulation and Childhood Obesity. The Campaign is a national coalition of health care professionals, educators, parents, and advocacy groups working for the rights of children to grow up—and the rights of parents to raise them—without being undermined by rampant consumerism.

The Campaign believes that the advertising industry’s thirty-year experiment with self-regulation has failed. Children see more marketing in more venues than ever before and much of this marketing is for unhealthy food. Child-targeted marketing influences children’s food choices, contributes to the childhood obesity epidemic, and makes parents’ lives more difficult.

The Campaign does not believe that the industries responsible for this marketing can fix these problems without government restrictions; merely tweaking the existing system of self-regulation is not the answer. Far too often there is a conflict of interest between industry’s mandate to make a profit – a legal mandate in the instance of corporations – and public health and safety. Ultimately it is the government’s role, not the role of corporations, to safeguard the health of our children.

There is no doubt that food marketing is a factor in children’s consumption of unhealthy food and in the rise of childhood obesity. Studies of food marketing to children conducted by such august bodies as the



World Health Organization,¹ the Kaiser Family Foundation,² the British Food Commission,³ and the Institute of Medicine⁴ all point to a link between child-targeted marketing and childhood obesity. While food marketers tend to minimize or deny the connection between children's food choices and advertising, this stance is puzzling. Either advertising works or it doesn't. If it works, then the marketing targeted to children will lead to a rise in consumption of the products being advertised to them. If it doesn't work, then why are companies spending billions of dollars annually to target children?

The Campaign believes that any legitimate conversation about marketing—including one about self-regulation—must include the point of view that government regulation, not self-regulation, is the best way to minimize the negative effect that advertising and marketing have on the health and well-being of children.

In compliance with the FTC's request for comments, this document addresses topics that will be covered at the workshop, specifically Topics 1, 3 and 6. In the first section, we detail the numerous ways in which food marketers infiltrate children's lives. The next section addresses the effectiveness of the Children's Advertising Review Unit (CARU), the existing industry-wide self-regulation program. In the final section, we outline proposals that would protect children from the marketing of unhealthy foods and comment on guidelines proposed by the Center for Science in the Public Interest.

Food Marketing to Children and Childhood Obesity

Television Commercials

In spite of the growing popularity of the Internet and computer games, television is still the primary medium advertisers use to reach children. Almost all of the food commercials children see on television are for foods high in calories, fat, salt, and/or sugar.⁵ Television food advertising is effective: Children's requests for food products, misperceptions about nutrition, and increased caloric intake have been shown to be linked to television advertising.⁶ One thirty-second food commercial can affect the brand choices of children as young as two, and repeated exposure has even greater impact.⁷

¹ World Health Organization. Diet, Nutrition, and the Prevention of Chronic Diseases. Geneva: The World Health Organization; 2003. Available from http://whqlibdoc.who.int/trs/WHO_TRS_916.pdf.

² The Henry J. Kaiser Family Foundation. The Role of Media in Childhood Obesity. Menlo Park, CA: The Henry J. Kaiser Family Foundation; 2004, February. Available from <http://www.kff.org/entmedia/loader.cfm?url=/commonspot/security/getfile.cfm&PageID=32022>.

³ Delamy, K, Hanna, E, & Lobstein, T. Broadcasting Bad Health. Why Food Marketing to Children Needs to be Controlled. London: The International Association of Consumer Food Organizations for the World Health Organization Consultation on a Global Strategy for Diet and Health; 2004. Available from http://www.foodcomm.org.uk/Broadcasting_bad_health.pdf.

⁴ Koplan, J, Liverman, C, & Kraak, V, editors. Preventing Childhood Obesity: Health in the Balance. Washington, DC: Institute of Medicine of the National Academies; 2005.

⁵ Kotz, K, & Story, M. Food Advertisements During Children's Saturday Morning Television Programming: Are They Consistent with Dietary Recommendations? J Am Dietetic Assn, 1994; 94: 1296-1300.

⁶ Horgen, KB, Choate, M, & Brownell, KD. Television Food Advertising: Targeting Children in a Toxic Environment. In: Singer D, Singer J, editors. Handbook of Children and the Media. Thousand Oaks, CA: Sage; 2001: 447-461.

⁷ Borzekowski DLG, & Robinson TN. The 30-Second Effect: An Experiment Revealing the Impact of Television Commercials on Food Preferences of Preschoolers. J Am Dietetic Assn. 2001;101(1): 42-46.

Brand Licensing

When considering the degree to which food advertising permeates television viewing for children, we also have to consider brand licensing (when an image or logo is leased for use on products other than the one it was created for) and product placement (when products are inserted into the content of programming). Along with most children's movies, many of the TV programs children watch partner with food companies. For instance, in 2003, six hours of programming on Nickelodeon one Sunday afternoon contained forty food commercials, or about one every nine minutes⁸. That figure, however, did not include all of the programs whose characters are now icons for food products. Nickelodeon's hit program *SpongeBob SquarePants* was Kraft's top selling macaroni and cheese in 2002 and the number one "face" shaped Good Humor Ice Cream Bar.⁹ Once a program is associated with a particular brand, the program itself becomes an ad for that food. Visit any supermarket and you'll find shelves filled with examples of these links between media programs and food manufacturers.

Star Wars: Episode III – Revenge of the Sith, released in May, 2005, had sixteen food promotions featuring twenty-five different products. Many of these promotions encouraged young children to consume large portions of food that is high in calories, fat, and sugar. To collect all 72 Star Wars M&M wrappers, children would need to buy forty-five pounds of M&Ms (containing more than 10,000 grams of sugar). To collect all thirty-one Star Wars Super D toys "for free," kids will need to buy more than five Burger King children's meals; a typical children's meal of a cheeseburger, small fries, and kid's Coke contains 690 calories, 28 grams of fat, and 35 grams of sugar. The prizes in many of these promotions – toys, puzzles, the Lego Star Wars Video Game – were clearly chosen for their appeal to very young children, despite the fact that *Revenge of the Sith* was rated PG-13.

Tie-ins like these are designed to lure children into selecting foods associated with favorite movie or TV characters. They are also designed to keep children continually reminded of products. As one marketing expert says, corporations are "trying to establish a situation where kids are exposed to their brand in as many different places as possible throughout the course of the day or the week, or almost anywhere they turn in the course of their daily rituals."¹⁰

Product Placement

Product placement—when a company pays to have its products inserted in the content of media—is prohibited by law in children's television programming, but is rampant in the prime time programs that are children's favorites. According to *Business Week*, Coca Cola paid \$20 million for product placement in the TV show *American Idol*,¹¹ a top rated program among children of all ages. *American Idol* has been consistently rated among the top ten shows for children 2-11, and is frequently among the top three. In the month of April, 2005, for instance, an average of nearly 2.5 million 2-11-year-olds were exposed to Coca-Cola advertising while watching each episode of *American Idol*.¹²

⁸ Linn, S. *Consuming Kids: The Hostile Takeover of Childhood*. New York: The New Press; 2004: 97.

⁹ Nevius, CW. One Extremely Absorbing Cartoon: Nickelodeon's Nutty 'SpongeBob SquarePants' is a Surprise Runaway Success. *San Francisco Chronicle*. 2003 March 9: 37.

¹⁰ Bob Brown, MarketResearch.com, quoted in: Kjos T. Marketers Compete Fiercely for Spending on Kids. *Knight Ridder Tribune Business News*. 2002 April 15: 1.

¹¹ Foust, D & Grow, B. Coke: Wooing the TiVo Generation. *Business Week*. 2004 March 1: 77.

¹² Nielsen Media Research, Cited in Cynthia Turner's *Cynopsis: Kids!* (email newsletter), 2005 January 2 – June 2, 2005.

Nor is product placement limited to television programs. Thus far, neither films, video games, nor the Internet has regulations about placing brands within the content of their media products aimed at children. For instance, McDonald's food products were embedded in the hit children's film *Spy Kids*. Burger King used product placement in the film *Scooby Doo 2*.¹³ On the Internet, companies lure children with "advergaming," in which computer games are built completely around products which keep children's attention focused on specific brands much longer than traditional commercials.¹⁴ One site, called *Candystand*,¹⁵ consists of games featuring products from the food conglomerate Kraft, such as Lifesavers, Crème Savers and Jello Pudding Bites. In the popular children's web site, *Neopets*, players earn points to take care of fantastical creatures. Now they can earn points by sending their friends a Reese's Puffs Cereal screen saver and by watching commercials for sugar cereals.¹⁶ *Neopets* has trademarked the term "Immersive Advertising," a description of the way that brands such as McDonald's, General Mills, Disney and others are incorporated into the children's use of the site.¹⁷ Even music is not exempt from product placement; McDonald's is paying hip-hop artists to incorporate Big Macs into their lyrics.¹⁸

Food companies also market to children through toys. Smuckers, for instance has a Cabbage Patch doll Peanut Butter and Jelly Kid, designed to sell a product called *Goobers*. HotWheels makes toy cars sporting the M&M candy logo. Barbie dolls work at both Pizza Hut and McDonalds, and the latter partners with Play Doh and Easy Bake.¹⁹ Coca Cola, which has stated that they do not market to children under twelve,²⁰ sells a Coca Cola Uno card game for children as young as eight, Coca Cola Checkers in a Tin for children as young as six, and a Coca Cola Wipe-off Memo Board with Coke Magnets & Dry Erase Marker for children as young as five.²¹

The Escalation of Marketing to Children

Today, children between the ages of 2 and 18 spend more than forty hours a week outside of school engaged with media, most of which is commercially driven.²² Children see about 40,000 commercials a year on television alone, a figure which does not include product placement.²³ Children are also spending more time on the Internet, where the lines between content and marketing can be blurred.²⁴ Advances in technology, such as the advent of digital and interactive television, bring about uncharted

¹³ Minnow, N. Common Sense Review of *Scooby Doo 2*. Accessed 6/06/05 from <http://commonsensemedia.org/reviews/review.php?id=2533&type=Video/DVD>.

¹⁴ Powell, C. Get in the Game. *Marketing Magazine*. 2003 July 28; 108(27): 11.

¹⁵ Candystand.com [homepage on the Internet]. New York: KF Holdings, Inc.; c2004 [cited 2004 March 29]. Available from <http://www.candystand.com/>

¹⁶ Neopets.com http://www.neopets.com/sponsors/cereal_adventure.phtml [cited 2005 June 2].

¹⁷ Winding, E. Immersed in Child's Play: A website that offers virtual pets has found a successful way of advertising to children. *Financial times*. 2002 June 10: 17.

¹⁸ Graser, G. McDonald's Buying Way into Hip-Hop Song Lyrics. *AdAge*, 2005, March 23.

¹⁹ Linn, S. What's Up with Food Marketing to Kids. PHAI Obesity Conference 2003: Proceedings of the First Annual Conference on Legal Approaches to the Obesity Epidemic; 2003 June 7; Boston; PHAI; 2003.

²⁰ http://www.activefactor.com.au/downloads/marketing_children_policy.pdf . Accessed 6/05/05.

²¹ <http://www.amazon.com/exec/obidos/search-handle-form/002-1855213-8532843>. Accessed 06/02/05

²² Roberts, DF, Foehr, UG & Rideout, VJ. *Generation M: Media in the Lives of 8-18 Year-Olds*. Menlo Park, CA: The Henry J. Kaiser Family Foundation; 2005.

²³ Kunkel, D. Children and television advertising. In: Singer D, Singer J, editors. *Handbook of Children and the Media*. Thousand Oaks, CA: Sage; 2001: 375-393.

²⁴ Roberts, DF, Foehr, UG & Rideout, VJ. *Generation M: Media in the Lives of 8-18 Year-Olds*. Menlo Park, CA: The Henry J. Kaiser Family Foundation; 2005.

avenues for marketers to target children. Cell phones are already being used as platforms for marketing unhealthy food to children. Pepsico has been using text messaging as a way of promoting Black Pepper Jack Doritos²⁵ as well as Pepsi and Sierra Mist.²⁶

Nor is marketing limited to the time children spend using media. Viral marketing campaigns, in which children are given free products to market to their (often unsuspecting) friends are increasingly common.²⁷ In 2000, a report from the federal government's General Accounting Office (GAO) called marketing in schools a "growth industry."²⁸ Exclusive beverage contracts, corporate-sponsored teaching materials, book covers featuring ads, and corporate-sponsored newscasts are just a few of the ways that marketing infiltrates educational settings.

Food marketers are increasingly targeting children at younger ages. Product placement can also be found in children's books, including those for babies. Scholastic publishes *The M&M Counting* book, HarperCollins publishes *Kellogg's Froot Loops: Color Fun Book*. These cardboard books are particularly troublesome because the covers often look exactly like the packaging these foods come in. Literacy experts encourage parents to read to babies and toddlers, citing gains in literacy and the promotion of positive parent-to-baby bonding. Babies and young children whose mothers or fathers read to them—especially when their parents take them on their laps or read to them at bedtime—associate warm, snuggly feelings with reading, and reading itself becomes early on a pleasurable experience for them. However, if the books they are reading include the *Hershey Kisses: Counting Board Book* or the *Skittles Riddles Math Book*, one can assume that babies are gaining equally warm, snuggly feelings about candy.

While food comprises a large portion of what is marketed to children, it is important to remember that food marketing occurs in the context of a myriad of other marketing messages, including advertising for toys, clothing, accessories, movies, television programs, video games, and countless other consumer goods. Even products traditionally purchased by adults such as automobiles and dog food are now being marketed to children. While children have been targets for advertising since the advent of mass marketing, the intensity and frequency of children's current exposure to commercial messages is unprecedented.

The sheer volume of marketing targeted to children is stressful for families.²⁹ As experts on child rearing urge parents to "pick their battles," parents are overwhelmed by commercially created battles to fight. If they are strict about food, should they also be strict about violent toys, media programs, and music? What about precociously sexualized clothing? Computer, video game, and TV time? Materialism?

The advertising industry argues that parents should bear sole responsibility for protecting children from marketing and that parents are to blame for the unhappy consequences of commercialism,³⁰ but it's clear

²⁵ Frito Lay. "If Not Now When?" – Doritos Launches Innovative Campaign. 2005 March 1. Accessed on 6/6/05 from http://www.fritolay.com/fl/flstore/cgi-bin/ProdDetEv_Cat_304_NavRoot_303_ProdID_390425.htm.

²⁶ Pepsico. Pepsi Turns to the Dark Side for Star Wars: Episode III Revenge of the Sith Promotions. 2005 March 24. Accessed on 6/6/05 from <http://phx.corporate-ir.net/phoenix.zhtml?c=78265&p=IROL-NewsText&t=Regular&id=688807&>

²⁷ Schor, J. *Born to Buy*. New York: Scribner, 2004.

²⁸ General Accounting Office. *Public Education: Commercial Activities in Schools: Report to Congressional Requesters*. Washington, DC: United States General Accounting Office; 2000. p. 26.

²⁹ Linn, S. *Consuming Kids: The Hostile Takeover of Childhood*. New York: The New Press; 2004.

³⁰ Linn, S. *Consuming Kids: The Hostile Takeover of Childhood*. New York: The New Press; 2004.

that marketers do not respect parents' authority as gatekeepers. While many parents struggle to set limits, corporations often undermine parental influence by encouraging children to nag.³¹ Marketers also encourage children to engage in other behaviors that are troublesome to parents. A 1999 article in *Advertising Age* begins, "Mothers are known for instructing children not to play with their food. But increasingly marketers are encouraging them to."³² Instead of acquiescing to parents' concerns, the marketing industry often sees parental disapproval as a strong selling point. When discussing the strategy for selling Kraft Lunchables, a marketing expert put it this way, "Parents do not fully approve—they would rather their child ate a more traditional lunch—but this adds to the brand's appeal among children because it reinforces their need to feel in control."³³

CARU: A Failed Experiment in Self-Regulation

The 1980 FTC Improvements Act and the 1984 deregulation of children's television stripped away many of the regulations that protected children from unscrupulous marketing. While a few restrictions still exist, since that time the advertising and marketing industry has been the primary guardian of commercial messages that target children.

The Children's Advertising Review Unit (CARU) is the advertising industry's self-appointed watchdog, but CARU has no enforcement powers and only five full-time employees to monitor billions of dollars worth of marketing directed to children annually. CARU was formed in 1974, long before 24-hour cable television networks for children, the escalation of brand licensing and product placement, and a number of other child-directed marketing techniques that are common today. Unlike a legitimate regulatory agency, CARU has made no significant attempt to keep up with the escalating expansion of marketing to children in the past twenty years. As recently as last year, by their own admission, CARU's purview did not extend to the newer forms of advertising and marketing such as in-school advertising, advergames, and peer-to-peer marketing.³⁴

Under CARU's watch, the amount of money spent on marketing to children escalated in the 1980s, doubled from 1992 to 1997,³⁵ and is currently estimated to be approximately \$15 billion annually³⁶—much of which is for marketing unhealthy food. Childhood obesity is now a major public health problem in the United States, and U.S. children are targeted as never before with marketing for foods high in sugar, fat, salt, and calories.³⁷ The failure of CARU to protect children from this barrage of junk food marketing is evidence that food marketers are unable or unwilling to self-regulate.

³¹ Frazier, A. Market Research: The Old Nagging Factor Can Pay Off for Marketers. *Selling to Kids*. 3(8). 1998 April 15.

³² Pollack, J. Foods Targeting Children Aren't Just Child's Play: Shape-Shifting Foods, 'Interactive' Products Chase Young Consumers. *Advertising Age*. 1999 March 1.

³³ Neville, L. Kids' Brand Must Exercise Pest Control. *Brand Strategy*. 2001 November 2: 17.

³⁴ The Motherhood Project. A Word from the Sponsors: Industry Leaders Respond to Mothers' Questions About Self-Regulation and Advertising to Children; 2004. Available from http://www.watchoutforchildren.org/html/word_from_sponsors.html - ExSumm.

³⁵ Lauro, P. Coaxing the Smile That Sells. *Baby Wranglers in Demand in Marketing for Children*. *The New York Times*; 1999 November 2.

³⁶ Schor, J. *Born to Buy*. New York: Scribner, 2004, p.21.

³⁷ Dalmeny, K, Hanna, E, & Lobstein T. *Broadcasting Bad Health: Why Food Marketing to Children Needs to be Controlled*. London: International Association of Food Consumer Food Organizations; 2003. Sponsored by the World Health Organization Consultation on a Global Strategy for Diet and Health.

Perhaps the most damning evidence comes from the marketers themselves. A 2004 Harris Interactive Survey of Youth Marketers found³⁸:

- 91% of youth marketers agree that children are marketing to in ways that they don't even notice.
- 73% agree that companies put pressure on children to pester their parents
- 72% agree that companies put pressure on kids to grow up faster than they should.
- 61% agree that advertising to children begins at too young an age.
- 58% agree that the youth marketing professionals believe that "there is too much marketing and advertising directed toward children."

An industry in which so many of its members believe it is acting unethically is an industry that is crying out for help. Clearly the quest for profits and fierce competition between food companies is trumping considerations about what's best for children. Indeed, under the current system, a company that doesn't target children is at a competitive disadvantage. Only an across-the-board set of restrictions – designed and enforced by a body from outside of industry – can both protect children's health and maintain a level playing field between companies.

Proposals for New Initiatives

The United States regulates marketing to children less than most other industrial democracies. There are a number of restrictions on marketing in other countries which could bring welcome relief to American families. Sweden and Norway ban marketing to children under twelve.³⁹ The Province of Quebec, in Canada, bans marketing to children under 13.⁴⁰ Greece prohibits ads for toys on television between 7AM and 10PM. Ads for toy guns and tanks are not allowed at any time. In the Flemish speaking areas of Belgium, no advertising is allowed within five minutes of a children's television program shown on a local station.⁴¹ Advertising regulations proposed by the European Union would ban commercials suggesting that children's acceptance by peers is dependent on their use of a product.⁴² Finland bans advertisements that are delivered by children or by familiar cartoon characters.⁴³ The French parliament government recently banned all vending machines in middle and secondary schools.⁴⁴ And, in 2004, the British Broadcasting Corporation severed marketing connections between their children's programming and junk food companies.⁴⁵

The Center for Science in the Public Interest (CSPI) has proposed Guidelines for Responsible Food Marketing to Children.⁴⁶ The Campaign endorses these guidelines, with two important caveats. First, we believe that the guidelines identified by CSPI should be enforced by a government agency (e.g. the FTC) and not simply be adopted as a voluntary industry code.

³⁸ Geraci, J, Markow, D, & Hirsch, O. Harris Interactive/Kid Power Summary Report of Youth Marketers. Harris Interactive, 2004.

³⁹ Briggs, B. Wallace Hints at Ban on Junk Food Adverts as the Best Way to Fight Obesity Among Young. The Herald. 2003 February 1: Sect A:1.

⁴⁰ Rivard, N, LeBlanc P. Advertising to Kids in Quebec No Picnic. Strategy. 2000 May 8; Sect. B:10.

⁴¹ Rowan, D. Hard Sell, Soft Targets. The London Times. 2002 October 18; Sect. 2:6.

⁴² Metherwell, M. EU Commission Targets Unfair Businesses Practices. The Sydney Morning Herald. 2003 June 19; 3.

⁴³ Hawkes C. Marketing Food to Children: The Global Regulatory Environment. Geneva: World Health Organization. 2003.

⁴⁴ Taylor, P. Liberty, equality, fraternity . . . obesity? The Globe and Mail. 6 August, 2004; A11.

⁴⁵ BBC to Limit Ties to Junk Food. The Wall Street Journal. 2004 April 6;Sect. D:5.

⁴⁶ Center for Science in the Public Interest. Guidelines for Responsible Marketing to Children.

Second, these guidelines should apply to all foods and not just those defined by CSPI as “low-nutrition” or “nutritionally-poor choices.” Public service announcements that promote the value of eating well may contain messages that children need to hear, but even when companies pitch more healthy branded food to children they encourage them to get in the habit of making food choices based on factors that have nothing to do with nutritional qualities—and often not even on taste—but rather on packaging, premiums, contests, brand licensing and celebrity tie-ins. If we expect parents to be responsible for what their children eat, we must respect their authority as gatekeepers and afford them the freedom to help children develop healthy eating habits without being undermined by packaging and commercials designed to exploit children’s developmental vulnerabilities.

There are a number of other initiatives that could protect children from junk food marketers, including:

- Designate schools as commercial-free zones. This would include an end to in-school advertising, vending machines, and fast-food outlets. In an increasingly marketing-saturated world, children need space to develop free from commercial pressures. In addition, in school-marketing is inherently unfair to children since they are a captive audience.
- Extend the ban on product placement on children’s television to all children’s media. If clear separations are needed between programs and content on children’s television, then clearly the same separations are needed in other media, including video games—a growing market for product placement - and the Internet, which would end advergaming.
- Extend the ban on product placement to include prime time programs, such as *American Idol*, that are not covered by the ban and are watched by millions of children. Restrictions on food marketing should apply to shows that are watched by significant numbers of children, not merely those shows that are designated for children.

However, it is important to note that the Campaign believes that debating the merits of individual initiatives is less important than determining who should be responsible for creating and enforcing restrictions on marketing to children. As stated earlier, it is the government’s role, not the role of corporations, to safeguard the health of our children. As an important first step, Senator Tom Harkin (D-Iowa) has proposed legislation (the HeLP America Act) that would restore the FTC’s rulemaking authority with respect to child-directed marketing.

Commission Chairman Deborah Platt Majoras has stated that industry self-regulation is preferable to government restrictions and claimed that “The FTC tried that approach in the 1970s, and it failed for good reasons.”⁴⁷ This characterization is inaccurate. While the FTC did formally propose a rule in 1978 that would have restricted the sale of sugared products to all children and ban all television advertising to children under eight, this rule was never implemented. Instead, the industries that would have been affected by the FTC’s proposals – advertisers, broadcasters, toy manufacturers, cereal producers, and the large corporate conglomerates that owned subsidiaries in many of these businesses - lobbied Congress to restrict the FTC’s authority and their efforts were rewarded. When the FTC refused to change their stance, Congress temporarily halted all funding for the agency and the FTC was literally forced to shut down all operations. Funding was only restored after Congress passed the FTC Improvements Act of 1980. This act rescinded the FTC’s authority to use “unfairness” as a standard for restricting advertising

⁴⁷ Majoras, DP. Remarks at the Obesity Liability Conference; May 11, 2005, Chicago, Ill. Available at <http://www.ftc.gov/speeches/majoras/050511obesityliability.pdf>.

or making industry-wide rules. Since the FTC's proposed bans were based on the idea that advertising to young children is inherently unfair, the FTC was forced to abandon their proposals.⁴⁸

Government restrictions did not fail; they were never implemented. It is the current policy of industry self-regulation that has failed. Given what is at stake - our children's health – the nation can no longer afford to look to corporations to police themselves. It is time to create agencies and policies that can protect children from the unscrupulous marketing of unhealthy food.

Sincerely,

The Campaign for a Commercial-Free Childhood

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⁴⁸ Kunkel, D. (2001). Children and television advertising. In: Singer D, Singer J, editors. Handbook of Children and the Media. Thousand Oaks, CA: Sage; 2001; 375-393.

